DRINKING WATER PROGRAM
FY 2005 & FY 2006
WEST VIRGINIA DEPARTMENT OF HEALTH AND HUMAN RESOURCES
Guidance and Reporting Checklist-

December 2006

This Guidance and Reporting Checklist attempts to capture all of the tasks which make up a state's drinking water program. This includes all Primacy elements and other statutory requirements under the Safe Drinking Water Act, and those activities which could be funded with the DWSRF set-aside funds, Operator Certification Expense Reimbursement Grants (ERG) or the state Water Protection Coordination (Security) grants.

This Guidance attempts to capture activities for two years to assist those states wishing to develop two-year workplans and PWSS applications reflecting a two-year budget.

This Guidance links the various aspects of the drinking water program to EPA's Strategic Plan goals, objectives and subobjectives. Example Outputs and Outcomes have also be included, but states are encourage to identify as many Outputs and Outcomes under the various program components as possible.

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4. Recommended Activities which are optional, but fundable under PWSS or DWSRF grants
5. Additional State Activities (optional)
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Attachments

A. New Rule Adoption and Primacy Application Deadline Dates for States
B. PWSS Key Performance Measures
C. FY 2005 and 2006 (updated) Calendars
D. Capacity Development Reporting Guidance placeholder
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All reporting is considered to be via the semi-annual self-assessments, unless noted otherwise.

1. Focus Activities for FY '05-06

These are the activities which need special emphasis during the year due to their importance or due to a regulatory deadline. These are listed here to capture your attention. These activities should not reduce the focus placed on responding to acute health contaminants at all public water systems.

- Continuation of Emergency Preparedness/Increased Security Activities with both state staff and public water suppliers, including responding to threats and emergencies.
- New Rule Development and adoption or submission of extension requests. Implementation of new federal rules to the extent possible under state regulations and as per Extension or Early Implementation Agreements.
- State Specific Activities
- Continuation of Operator Certification Programs and Expense Reimbursement for training
- Continue to improve Quality Systems and documentation of these systems, including revisions to QMPs and/or QAPPs as necessary due to the adoption of new regulations.
- Continue to improve data quality in SDWIS

The reporting on these activities should be done in the corresponding section of the Checklists.

Description of Joint Evaluation Process

The joint evaluation process will include semi-annual progress reports by the state, including the elements of 40 CFR §§ 35.115 and 31.40-41. EPA will assist the state in the development of a reporting checklist tool, completing the status of any known items for the state. The state will further complete the reporting checklist tool and submit to PEA on a semi-annual basis. EPA will review and provide feedback on these progress reports as quickly as possible. EPA will meet with the state, typically planned for mid-year timeframe, to discuss progress under the grant, any obstacles or short comings and make recommendations to the state for corrective action. EPA will provide all findings in writing to the state and may require the submission of a corrective plan by the state. In the event that resources do not allow EPA to meet with the state, e-mail and telephone discussions will take place to complete this evaluation.

DRINKING WATER PROGRAM GUIDANCE AND REPORTING CHECKLIST		
Goal 2: Safe and Clear Water--Ensure drinking water is safe. Restore and maintain oceans, watersheds and their aquatic ecosystems to protect human health, support economic and recreational activities, and provide healthy habitat for fish, plants and wildlife.		
Objective 1: Protect human health by reducing exposure to contaminants in drinking water (including protecting source water), in fish and shellfish, and in recreational waters.		
Subobjective 1: Water safe to drink		
Task	**Activity (Also notes statutory/regulatory citations)**	**Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes**
2. Activities Required to Maintain Public Water System Supervision (PWSS) Program Primacy. See elements of 40 CFR §§142.10, 142.12, 142.14, 142.15, and 142.16. **Outcomes: Implementation of an effective drinking water program as described in the workplan, increasing the knowledge and awareness of water suppliers of drinking water regulations; improved public health protection; increased public awareness of drinking water quality; achievement of compliance with drinking water regulations; measureable progress toward achievement of all outputs.**		
2.1 Data Management **Outputs: ensuring accurate and complete data related to inventory, compliance and enforcement activities are provided to EPA in a timely manner, each quarter;**		
2.1.1	Participate in and follow-up to EPA **Data Verification Audit findings.** State will address major findings of the report and report to EPA on its activities to prevent future occurrences. [Next review is scheduled for July 2005.]	All audit findings were addressed in a letter to EPA dated March 15, 2006.

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.1.2	Maintain a data base management system that accurately tracks the inventory (including routine updates of system information), tracks water quality monitoring information, and calculates monitoring and reporting (M/R) and maximum contaminant level (MCL) violations for all rule implementation priorities. §142.14(c)	West Virginia continues to improve the optional use of SDWIS/State for inventory, water quality, and calculating M/R and MCL violation. This is an on-going project.
2.1.3	Report all violations and inventory updates for all systems, and for all rule implementation priorities, to the Safe Drinking Water Information System (SDWIS)/Federal system (FED). Also report any problems in reporting to SDWIS/FED on time. §142.15(a) & (b)	This is an on-going project. **EPA Comment:** WVDHHR successfully met this grant commitment.
2.1.4	SDWIS/FED reporting includes the following activities: a. Report all inventory updates with at least all of the mandatory reporting elements that determine grant eligibility. Refer to Appendix A of the Consolidated Summary of State Reporting Requirements for the Safe Drinking Water Information System (SDWIS) documentation, for the details on this reporting.	On-going through the use of SDWIS/State.

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.1.5	b. Report all M/R, MCL, Public Notification (PN), and treatment technique violations for all rules including M/R violations for unregulated contaminant monitoring. This activity includes tracking monitoring results, and recording violations for all community water systems (CWS), non-transient non-community water systems (NTNCWS), and transient non-community water systems (TNCWS).	Unregulated contaminant monitoring rule (UCMR) reports are submitted directly to EPA from the Public Water Systems (PWS). Other rules are reported to EPA quarterly using SDWIS/State migration.
2.1.6	c. Report all formal enforcement actions and successfully link them to all appropriate violations. d. Report all variances and exemptions e. Report all milestone information required under the regulations. f. Report all required SWTR data (e.g., treatment codes for all surface water, purchased surface water, GUDI and purchased GUDI sources, seller's public water system identification (PWSID) number for purchased surface water and purchased GUDI sources, filtration reason codes, etc.)	c. On-going through the use of SDWIS/State. d. WV does not have primacy for variances and exemptions. e. On-going through the use of SDWIS/State. f. On-going through the use of SDWIS/State. **EPA Comment:** WVDHHR successfully met this grant commitment.
2.1.7	g. Report compliance achieved, identify and correct erroneous data, and submit deactivation data to SDWIS/FED for all applicable systems, especially Significant Non-compliers (SNCs).	This is an on-going project. **EPA Comment:** State is responding in a timely manner to any unaddressed SNCs and identifying errors in EPA reports.

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.1.8	Plan for and make system programming changes to meet any changes to the reporting requirements that will be effective in FY 2005 or early FY 2006. (Appendix A of Document EPA-812-B-95-001 summarizes all of the current reporting requirements.) Specifically, plan for SDWIS Modernization, and new regulation reporting requirements in sufficient time to meet reporting deadlines of these new rules. Also see Implementation Guidances for each new rule for details on data management/data reporting requirements. §142.15	On-going. The latest version of SDWIS/State Web Release 1 should be up and running soon. Training on its use will be through a hired contractor in August 2006.
2.1.9	Verify and ensure the accuracy of SDWIS/FED data when SDWIS printouts are made available to the State.	Error reports are addressed and pre-compliance reports are run to detect errors prior to sending violations or quarterly reports to EPA.
2.1.10	**LCR unaddressed violations** - Update data on PWSs that received a violation for monitoring or missed milestones and do not have a follow-up action reported for compliance achieved (i.e., SOX) that is linked to the violation. §142.16(c)(4)	Completed. Updates are made as new information comes in. **EPA Comment:** WVDHHR successfully met this grant commitment.
2.1.11	Report **Public Notice (PN) violations** on a routine basis where appropriate. §142.15(a)(1)	On-going through data entry and reporting by district offices.
2.1.12	For **new rules,** (M/DBP, LCRMR, FBRR, IESWTR, Rads, Arsenic, and LT1) enter data into SDWIS. States not using SDWIS-State must develop the capability of reporting to SDWIS as per Extension/Implementation Agreements. For new rules which are in effect, but the state does not have Primacy, report information for EPA, Region III to make compliance determinations (see specific reporting needs in applicable Extension or Letter Agreements).	Using the latest version of SDWIS/State and anticipating a new version in 2006, SDWIS Web Release 1.

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.1.13	Provide adequate staff training in data management procedures for all rules to ensure proper review of data, compliance determinations, data handling and error corrections,	On-going.
2.2 Compliance and Enforcement including Implementation of all PWSS Program Activities required by 40 C.F.R. §§142.15 & 142.16. Activities are listed by general first and then by National Primary Drinking Water Regulation (NPDWR). **Outputs: undertaking enforcement program with informal and formal actions; making compliance determinations consistent with federal regulations; developing and delivering training programs for staff and public water suppliers**		
2.2.1	Complete Annual Compliance Report **by July 1st**, for previous calendar year. SDWA Section 1414(c)	Last compliance report was mailed to EPA on June 28, 2005. An extension has been granted by EPA for the 2005 Annual Compliance Report (that was due on or before July 1, 2006).
2.2.2	Promote compliance with the regulations. Notifying all systems of regulatory requirements and responding to questions (this includes CWSs, NTNCWSs and TNCWSs), taking enforcement action against recalcitrant or noncompliant systems, providing technical assistance, and issuing waivers, variances and exemptions, where appropriate. **Give detailed comments <u>if possible</u> on what specific actions have been taken to promote compliance.**	1,299 calls for Compliance Officers and District Engineers regarding regulatory requirements, Capacity Development, administration assistance, public notice, and monitoring schedules. Violations = 3,403; Administrative Orders = 0 Suspension of Food License Letters = 29
2.2 Compliance and Enforcement including Implementation of all PWSS Program Activities required by 40 C.F.R. §§142.15 & 142.16. Activities are listed by general first and then by National Primary Drinking Water Regulation (NPDWR).		

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.2.3	Maintain records of pertinent State decisions (e.g., filtration decisions, waiver determinations, public notification provisions). Report to system files all responses to M/R and MCL violations in accordance with escalation procedures as negotiated in the State Compliance Strategy. Report to system files all documentation of informal enforcement activities. §142.14	On-going. **EPA Comment:** WVDHHR successfully met this grant commitment.
2.2.4	Provide responses on SNC systems, on a quarterly basis using the standard format supplied with quarterly lists, to the SDWA Branch. Work with EPA SNC Coordinator to determine why problems are occurring and take steps to correct.	4 responses to quarterly SNC reports. Participate in conference calls with EPA SNC Coordinator and communicate through e-mails. June 2006 March 2006 December 2005 September 2005
2.2.5 Government Performance and Results Act (GPRA) State Reporting Measures and Key PWSS Program Performance Indicators GPRA Measures: Reporting is met by reporting the required quarterly SDWIS compliance data or through other reporting already done under other initiatives such as the Source Water Matrix or Wellhead Protection Program reports. For information not already reported to EPA, **reporting frequency is semi-annual**. The following are the GPRA State Core Performance Measures and Associated Reporting Requirements:		
A	**EPA Region III PWSS Key Performance measures** - FY'04 will serve as the baseline for the FY'05-'06 time frame. See Table in PWSS Guidance, Appendix B.	Compliance with many of these measures is tracked in SDWIS. Further reporting is required for measures relating to source water protection and sanitary surveys.

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.2.6	**SWTR:** Implement the entire rule. Complete GUDI determinations for all CWS and all NCWS as per negotiated deadlines in Corrective Action Plan since regulatory GUDI determination deadlines have past: CWS - June 29, 1994; NCWS - June 29, 1999 **EPA Comment:** Negotiated deadlines for completing GUDI determinations: TNCs – 9/30/00 CWSs and NTNCWSs – 3/31/01 4% of NTNC and NC remaining to be classified under the '98 CA Plan. WVDHHR is working to complete these as soon as possible.	Below are the systems GWUDI determinations as of June 30, 2006. For reporting purposes, we have established January 1, 2004, as a benchmark. Systems that became active or existing systems that added new sources after January 1, 2004, are separated and considered new. GWUDI Status Systems Active Prior to January 1, 2004: Community – 100% Classified NTNC – 99% Classification – 1 Testing – 1% Percentage NC – 97% Classification – 12 Testing – 3% Percentage GWUDI Status Systems Active After January 1, 2004: Community – 0% Classification – 1 Testing – 100% Percentage NTNC – 62% Classification – 9 Testing – 38% Percentage NC – 67% Classification – 26 Testing – 33% Percentage
2.2.7	**TCR:** Implement the entire rule for all system types. Implementation includes: enforcing routine and repeat monitoring, making compliance determinations, conducting sanitary surveys, and reviewing sample site plans. Enforce additional routine monitoring the month following a positive sample and PN requirements.	Implementation and enforcement of the TCR is on-going. 224 sampling site plans reviewed.
2.2.8	**Phase II and V Rule** for nitrates and nitrites: Implement the entire rule for all system types. Implementation includes: enforcing initial and follow up monitoring, making compliance determinations, and following up on violations	The Nitrate/Nitrite rules have been implemented in their entirety.

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.2.9	**Phase II and V Rule** for Chronic Contaminants: Implementation includes making compliance determinations for monitoring that has been conducted, enforcing follow-up monitoring where results are greater than the MCL, and follow-up on MCL violations. States are also encouraged to make development and implementation of waiver programs a priority implementation activity. Enforce follow-up monitoring requirements where results are less than the trigger level. Enforce initial monitoring, and enforce follow-up monitoring where results are between the trigger level and the MCL.	Rules governing chronic contaminant MCL level exceedances have been implemented in their entirety. Sampling schedules have been evaluated/revised to increase monitoring of MCL violations or decrease monitoring where values are consistently below trigger levels. 165 Tier 2 violations issued. **EPA Comment:** No enforcement actions reported this period.
2.2.10	**Lead and Copper Rule (LCR)** including the **Minor Revisions** for all PWSs: Implement the entire rule for all systems. Enforce routine water quality parameter monitoring and additional lead and copper monitoring. Enforce public education for all systems. Report action level exceedances and milestone information to SDWIS.	Violations have been issued for LCR exceedances, and sample schedules evaluated/revised to more closely monitor problem PWSs. Public Notices have been issued with each LCR violation. The LCR action level exceedances are routinely reported in SDWIS.
2.2.11	**Stage I DBP:** Continue implementation of the Stage 1 DBP. Ensure that systems update their monitoring plan if they change any of their sampling locations or dates.	The District Office review/approve all sampling location/date change to the PWS monitoring plans.
2.2.12	**IESWTR:** Continue implementation of IESWTR. Provide a list of systems that have had a sanitary survey completed during the previous year and an annual evaluation of your state's program for conducting sanitary surveys (§142.15(c)(5)).	Weirton and Wheeling underwent a sanitary survey during the previous year. We continuously evaluate sanitary survey procedures for improvement.

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.2.13	**Rads:** Implement the radionuclides rule. Work with PWS's, as needed, to ensure they are aware of their regulatory requirements. Work with the appropriate state agency to identify systems designated as "contaminated" or "vulnerable to contamination" by nuclear effluents and monitor accordingly.	Rad requirements have been identified and monitoring schedules generated/sent to PWS, based on historical data required by new Rad Rule. No systems have been identified as contaminated or vulnerable.
2.2.14	**Arsenic:** Implement the Arsenic rule. Work with PWS's, as needed, to ensure they are aware of their regulatory requirements.	The Arsenic Rule, effective 1/23/06, will be implemented. Arsenic sampling requirements have been separated out in the PWS monitoring schedule to heighten awareness. **EPA Comment:** All CWS and NTNCWS must be in compliance by 12/31/07 therefore no violations have been issued to date. Historically 4 systems have been reported > 10ppb – 2 are back in compliance, 1 will be closing at the end of 2006 school year and 1 is working on lowering arsenic levels below the MCL.
2.2.15	**FBRR:** Review plant recycling information during sanitary surveys.	Recycling information is reviewed during each sanitary survey.
2.2.16	**LT1:** Inform the affected systems of their requirements under the rule and report any violations to SDWIS/FED.	Affected PWSs are required to submit turbidity readings on their Monthly Operating Reports, and violations are issued for noncompliance of filtration and M/R reporting requirements.
2.2.17	**All Other Currently Regulated Chemicals**: Take enforcement actions for all arsenic MCL and M/R violations. Enforce total trihalomethane monitoring and MCL violations. Enforce current radionuclide standards. Enforce monitoring for other contaminants. Enforce against systems with other MCL violations	Violations have been issued for all non-compliance of MCL and M/R requirements.

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.2.18	**PN Rule**: Include public notification requirements in compliance assistance and enforcement actions that are taken on MCL, treatment technique, and M/R violations following all aspects of **Revised PN Rule effective May 2002.**	PN Rule requirements and certification forms have been included with each MCL, treatment technique, and M/R violation per revised PN Rule.
2.2.19	Revise the **State Compliance Strategy** to reflect changes in the State and Federal regulations, including revised Penalty Authorities, any new or revised State MCLs, any new SNC definitions, State procedural or organizational changes, and State/U.S. EPA Enforcement Agreements. The revisions should also include updated timely and appropriate flow charts for TCR, total trihalomethane, Radionuclides, Phase 2 and 5, SWTR, Lead Ban, and LCR violations, the CCR rule, IESWTR and DDBP rule, LCRMR, Arsenic, FBRR, LT1, and other new rules when available. The charts should trace the State's response from identification of a violation through the State's most formal enforcement tools to final compliance. §142.11	Revision completed May 2003. Copy submitted to EPA in 2003. Need to update document to reflect new rules promulgated since that time. **EPA Comment:** EPA continues to work on developing enforcement response policy.
2.2.20	Screen data submitted by public water systems for evidence of data falsification, and take follow-up enforcement action as appropriate.	Data submitted by public water systems is reviewed by staff. Enforcement actions will be taken for data falsification
2.2.21	Certify that the responsible State agency (if not the drinking water program) continues to enforce the **Lead Ban**, through inspections and State enforcement actions. §142 **If possible, report on inspections and enforcement actions taken to enforce Lead Ban**	Not allowed to use lead solder in federal rule that was adopted by reference. Through the enforcement of the Lead & Copper rule, if have an exceedance of the lead level, then suspect use of illegal lead solder.

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.2.22	Maintain records of tests, measurements, analyses, decisions, and determinations performed on each PWS to determine compliance with application drinking water regulations; sanitary surveys, enforcement actions, vulnerability determinations, Public Notice, etc.; make records available to the Regional Administrator upon request. §142.14	All data results are entered into SDWIS. The data results, plus all pertinent compliance and enforcement records are stored in the records department for the specified length of time per 40CFR 142.14.
2.2.23	**Consumer Confidence Report:** Report on implementation of CCR Rule (§142.15, §142.16(f)) States with Primacy for the CCR rule must report violations and enforcement actions directly to SDWIS by 11/15. States without Primacy: Report in August CWSs that sent out CCRs and those that did not in an easy to read format, EPA will generate violations for SDWIS. Report similar data for the certifications.	For the reporting year 2005 we received 482 CCRs and 459 certification forms. 50 systems failed to submit CCRs and 73 systems failed to submit certification forms. We assisted in the preparation of 53 CCRs. We also sent out 17 computer diskettes and 44 computer CDs to assist water systems in preparation of future CCRs. Primacy. In August 2005, a list of CCR delinquent water systems and in October 2005 a list of certification form delinquent systems was submitted to our compliance division for entry into SDWIS and enforcement action.
2.2.24	Consider this a place holder for the Office of Enforcement and Compliance (OECA) reporting measures. [As far as we know, there are no additional reporting requirements for the States. OECA primarily looks at SNCs, SNCs which have returned to compliance, and those SNCs which are exceptions. OECA Priorities include implementation and enforcement of microbial rules and Federal enforcement of new rules]	

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.3 Regulation Development and Authority Adopt all rules on schedule as required by §142.12 and any Special Primacy requirements found at §142.16. States are strongly encouraged to adopt rules within the two years deadline to avoid a crunch in future years. Complete all primacy application packages as specified in any applicable memorandum of agreement or extension agreement. Report on any major implementation issues or problems. Apply for extension of time to adopt new regulations within two years of promulgation. Region III prefers **at least a 3 month lead time** to complete Extension Agreements by this deadline. Also see EPA Region III's Binders, mailed to each State as the Implementation Guidances become final (these contain the primacy revisions to specific rules and new primacy requirements to be added as per SDWA 1996). **NOTE: All rule effective dates, primacy revision package/extension request dues dates are included in Appendix A of the PWSS Guidance Document**.		
2.3.1	**Analytical Methods Rule Changes** Revise the State rules so that they are as stringent as the Federal analytical methods changes. §142.12	Completed **EPA Comment:** WVDHHR successfully met this grant commitment.
2.3.2	Maintain required statutory and regulatory authorities (those upon which primacy approval was based). Report on the status of any State reorganizations, and their effects on statutory or regulatory authorities, and on implementation. Report on any changes to statutory, regulatory or laboratory certification status of the State Primacy Agency. §142.12	Completed – No re-organizational changes have been made that would have an impact on statutory or regulatory authority. **EPA Comment:** WVDHHR successfully met this grant commitment.
2.3.3	Prepare for and adopt **Ground Water Rule (GWR)** Submit Primacy Revision Application or Extension Request to EPA by mid 2007 based on estimate of late 2005 final rule promulgation. §142.12 and §142.16	GWR is now anticipated to be promulgated August 2006. Primacy application cannot be submitted until 2008, at the earliest.

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.3.4	Prepare for **Radon Rule**. Identify systems which may have elevated levels and work with systems to reduce risk of exposure. §142.12	No activity for this reporting period.
2.3.5	Prepare for **new regulations** to be promulgated in 2006 and 2007 with State rule adoption due 2 years later: LT2/Stage 2 DBP, Conduct early implementation activities as per checklist for these 2 rules. §142.12 and §142.16	Have signed Partnership Agreement for two rules. Have proposed revised state regulations to adopt the federal regulations. Anticipate adoption of rules in early 2007 and submission of primacy application in late 2007. Have made plans for early implementation activities.
2.4 Surveillance and Technical Assistance		

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.4.1	Maintain an adequate sanitary survey program. Document deficiencies found in the surveys and follow-up to correct these deficiencies within the State's authority. Please provide the number of CWSs, NTNCWSs, and NCWSs which are scheduled for sanitary surveys in FYs 2006 and 2007 in the State's workplan and provide an update on the number of surveys completed. Please report on any key survey deficiencies or issues at SNC systems. §142.16	**FY 06:** CWS = 139 NTNCWS = 29 TNCWS = 36 TOTAL = 204 **Projected FY 07:** CWS = 120 NTNCWS = 15 TNCWS = 3 TOTAL = 138 **Projected FY 08:** CWS = 135 NTNCWS = 10 TNCWS = 10 TOTAL = 155 Deficiencies observed during inspections are described in Sanitary Surveys and the systems are notified of requirement to respond to deficiencies within 45 days. Systems' responses are reviewed and tracked with follow-up contact for assurance of implementation plans.

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.4.2	Maintain adequate plan and specification review program to assure that design and construction of new and modified drinking water system facilities will be capable of complying with the drinking water regulations. Please provide an update on the number of reviews completed, or key problem areas in semi-annual self-assessment. §142.10	Plan Review: 371 Permit issued: 312
2.4.3	Maintain the capability to respond to emergency circumstances and to ensure provision of potable drinking water under emergency circumstances. §142.10	No on-going emergency issues. Will utilize staff as necessary to respond to emergencies. **EPA Comment:** WVDHHR's revised Emergency Plan due to EPA NLT October 2007.

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.4.4	Maintain documentation for and implement a Quality Management System which includes an adequate laboratory certification program. Update the State Quality Management Plan for the PWSS Program. The State **PWSS Quality Management Plan (QMP)** documents the Standard Operating Procedures (SOP) and QA/QC requirements for the laboratory and the PWSS quality assurance systems. The QMP will include management and organization regarding QA, descriptions of technical tools of QA for all program functions including: laboratory certification and SOPs; PWS compliance, inventory and monitoring data; personnel qualifications and training, and other information. This plan is mandatory for all PWSS grant recipients and must be updated annually or as needed. Submit additional requested documentation for conditional approved plans to make QMPs approvable. 40 C.F.R. §30.54 and 31.45 and EPA Guidance–EPA QA/R-2	QMP was approved by EPA – September 28, 2005.

Task	Activity (Also notes statutory/regulatory citations)	Semi-Annual Progress Reporting and Additional Comments Outputs and Outcomes
2.4.5	Develop, implement and update documentation for **Quality Assurance Project Plans (QAPP)** for collection, transport and analysis of samples intended for developing information or data to be used for implementation of the PWSS Program. QAPPs are to follow EPA guidance on plan development. QAPPs are not necessary if State PWSS Program staff do not collect any samples in the implementation of the PWSS program. These plans must be updated as needed. 40 CFR §§30.54 and 31.45, EPA Guidance EPA QA/R-5. Review QAPPs of contractors.	QAPP was approved by EPA – September 28, 2005.
2.4.6	Establish and maintain a state program for the certification of laboratories conducting analytical measurements of drinking water; assure availability to the state of laboratory facilities certified and capable of performing analytical measurements of all contaminants. State Lab should complete PT sample studies and repeating of any analysis that were unacceptable in make-up studies. §142.10(b)(3) & (4) To the extent possible, place listing of labs on website.	On-Going. **EPA Comment:** EPA conducted its on-site review of WV's Lab Certification Program on September 19-20, 2006. There were no findings. WVDHHR successfully met this grant commitment.

2.4.7	**Unregulated Contaminant Monitoring Rule (UCMR) -** Carry out responsibilities under the mutually agreed upon Partnership Agreement (PA). Specifically those activities occurring in FY2005 & 2006 - Provide sampling and reporting assistance to those water systems performing monitoring of List 1 and List 2 contaminants; - Ensure that each system's treatment plant location(s) as latitude and longitude is reported to SDWIS; (this is in addition to the street address) - Assist EPA in obtaining water system compliance through follow-up contact with those systems non-complying. EPA will provide a list of such systems. - Review monitoring data reported to SDWARS/UCMR. - Work with Community water systems to include UCMR data in CCRs	Completed for UCMR 1. Have begun planning for UCMR 2.
2.4.8 Training		
2.4.8.1	Leverage both PWSS and DWSRF grant set-aside funding to increase the amount of training made available to operators of public water systems. Training on regulations, treatment technologies (particularly small system treatment technologies) and public education should be stressed. Report on the type and numbers of training courses given.	West Virginia Rural Water Association (WVRWA) continues to offer various training classes for water operators through the 2% technical assistance. WVRWA provides these classes under contract to WVBPH and the classes are based on suggestions of "critical training needs" by the operators. Between July 1, 2005 and June 30, 2006: 29 Different subject matter classes taught (Basic Math to Chemistry, etc.) 66 Total number of classes taught 465 Total Continuing Education Units (CEH) earnable. 1,142 Total number of operators attended 753 Total number of systems

2.4.8.2	Train State and local PWSS program staff on new and current regulations and water treatment technologies with a focus on small system treatment technology. EPA Region III will assist wherever possible.	EPA and/or ASDWA sponsored Web Cast training. Various workshops available: Groundwater Protection Council WV Water Conference Symposium Maryland Center for Environmental Training (MCET) workshop in Morgantown AWOP training WV Rural Water Association (WV RWA) Conference WV Contractor's Exposition (EXPO) Conference
2.5 Program Management		
2.5.1	Prepare preliminary FY 2006 and FY 2007 grant application(s) which addresses all applicable required grant elements, and submit all required grant forms and supporting documentation. 40 C.F.R. Part 31 & 35	FY 2007 draft grant application is prepared to be submitted in the next reporting period.
2.5.2	Prepare and submit a final FY 2006 and FY 2007 grant application which addresses all Region III comments on the preliminary draft plan, including all budget documentation and supporting information. 40 C.F.R. Part 31 & 35. Consider two-year applications.	The information for the PWSS Grant workplan FY 2007 was submitted to EPA Region III in May 2006.

2.5.3	Prepare and submit a semi-annual self assessment which reports State progress in meeting State program plan commitments to the Region. Entails reporting on all activities as identified in the work plan including those performed by the recipient, by contractors and through interagency agreements. **Self assessment shall include:** a progress summary, justification for any outputs not submitted in accordance with the agreed upon schedule, and a discussion of anticipated program problems in the upcoming quarter(s). The first status report should contain a listing of each milestone (output) and their schedule completion dates. It is expected that this document will also serve as a reporting tool. 40 C.F.R. §31.40 and §142.15	This report should be considered the semi-annual self assessment report.
2.5.4	As per Corrective Action Plan, continue efforts to hire and retain new staff; keep EPA informed of hiring status;	Please see the letter that has been provided along with the current organizational charts for the EED. **EPA Comment:** WVDHHR successfully met this grant commitment.
2.5.5	All changes to the approved workplan must be discussed with the EPA State Program Manager prior to making the change in order to determine if this is a significant program change requiring an amendment or other written documentation for the grant award. 40 CFR Part 31 & 35	Any significant proposed changes will be discussed with EPA State Program Manager.

2.5.6	Provide a Final Financial Status Report documenting FY 2004 and FY 2005 expenditures within 90 days of end of budget period. Program staff is strongly encouraged to work with state grants administrative staff to ensure that this occurs in a timely manner since it can effect carryover applications and awards. Report on steps taken to ensure this occurs. If State elects to apply for a two year budget and project period, FY 2005 FSR will be an interim submittal. 40 C.F.R. Part 31	There is constant communications with the accounting staff located within the Office of Environmental Health Services. If there are any problems, these can be addressed immediately. **EPA Comment:** WVDHHR successfully met this grant commitment.
2.5.7	Maintain records as per §142.14	Records of tests, measurements, analysis, decisions, and determinations performed have been maintained for each Public Water System per 40CFR142.14.
End of info for PWSS Workplan, although option items in #4 and #5 items could be listed as well for state to choose from and for tracking purposes.		

3 Activities Required to Receive Drinking Water State Revolving Loan Fund (DWSRF) Program Allocation

Note: Section 3 is included in this Generic Program Guidance for additional background information and to help describe the full breadth of the SDWA programs. If any state activity to meet requirements outlined here in Section 3 are funded under the DWSRF set-aside funds, they should NOT appear in the PWSS Program grant workplan. See additional National and Regional Guidance for more details on DWSRF applications/workplans.

The activities under Sections 3.0 General Provisions, 3.1 Capacity Development, and 3.2 Operator Certification are required to receive the entire DWSRF Program Allocation. The activities under Section 3.3 Source Water Protection, are not required to receive DWSRF funds. However, if the State wishes to adopt alternative monitoring requirements, the State must have an approved source water protection program, and the State can use DWSRF funds to conduct source water assessments.

Goal 2: Safe and Clear Water--Ensure drinking water is safe. Restore and maintain oceans, watersheds and their aquatic ecosystems to protect human health, support economic and recreational activities, and provide healthy habitat for fish, plants and wildlife.

Objective 1: Protect human health by reducing exposure to contaminants in drinking water (including protecting source water), in fish and shellfish, and in recreational waters.

Subobjective 1: Water safe to drink

3.0 General Provisions

This portion of the Checklist should be used to capture the 2%, 10% and 15% Set-aside funded activities only. The 4% Administrative set-aside and the loan portion of the program are handled by the MFAB at EPA Region 3 and as such, as not covered here unless specifically identified. A few reminders: State must (1) prepare a plan that identifies the intended uses of the amounts available to the DWSRF Program, annually, SDWA 1452(b)(1); (2) Develop and publish a list of prioritized projects in the State that are eligible for funding. The State should develop an overall priority list, as well as a list of projects to be funded in the coming year, SDWA 1452(b)(3)(B) and page 9-11 of the February 28, 1997 final DWSRF Guidance; (3) Review all Significant Non-compliers and list of chronic non-compliers before providing a loan, SDWA 1452(a)(3)(C); (4) Prepare and submit a report to U.S. EPA every 2 years on the State's activities in administering the DWSRF Program, including the findings of the most recent annual audits of the fund conducted by the State. SDWA 1452(g)(4), and page 45 of the February 28, 1997 final DWSRF Guidelines; and (5) provide semi-annual progress reports on Set-aside funded activities.

Outputs as noted below with each set-aside

Outcomes: Improved operational and/or financial efficiency; improved compliance with NPDWR for systems receiving technical assistance or improved operator performance; attainment of Primacy for new rules (for states using program funds for this purpose); improved data quality (for states using program funds for this purpose); reduced treatment expenses for water systems due to source water protection efforts; improved customer and stakeholder satisfaction; improved efficiency through consolidation or regionalization.

3.0.1	**2% set-aside funded activities**	Contract Continuing Education Hours (CEH) training for drinking water system operators. Between July 1, 2005, and June 30, 2006, the 2% grant has paid for 56 CEH approved classes for drinking water system operators including classes throughout the state. This training enable 1,050 operators from over 654 different systems to attend approved classes featuring instruction in both classroom and laboratory training environments at 28 different facilities. Class participants earned a total of 6,365 CEH's. The new classes offered included: Compliance with LT1ESWTR/S1DBPR ERP Workshop Procedures for Testing Backflow Preventors Working with Microsoft Windows Beginning Microsoft Excel Disinfection PRV Maintenance Chemistry of Water Treatment Occupational Hazards for Water Operators Leading Strategic Change Distribution Disinfection Procedures Safety Basics for Operators Standard Operating Procedures/Preventative Maintenance Fluoride Sampling and Handling Valve Location/System Design Drinking Water Lab Procedures Water System Employment and Ethical Conduct Issues Basics of Being a Chief Operator Ethical Considerations for Chief Operators Beginning Word Advanced Excel Chemical Feed Pumps and Dosages Basic Math Implementing a Quality Control/Quality Assurance Plan Implementing and Developing a QC/QA Plan Basics of Pumps and Motors Troubleshooting Pumps and Motors Small Water System Operation and Maintenance A "Basic Math Study Guide" was developed to aid students in preparation for the Class I treatment exam. A policy manual was developed to assist water utility management employees in hiring and training employees, along with a companion entrance exam. The training video "Basic Water Plant Safety" was also completed.
		Educate the public on SDWA topics. WVRWA (West Virginia Rural Water Association) goes to schools to teach children about drinking water; WVRWA displays at various conferences and exhibitions (RWA Conference, WV EXPO, etc); WVRWA educates the public by educating the water systems. WVRWA produces training videos – currently producing video "Basic Safety Procedures".
		Comply with federal and state grant reporting requirements for sub-recipients.

3.0.2	**10% set-aside funded activities**	OEHS collaborates with water systems to achieve full compliance with applicable federal and state regulatory requirements and standards, including new state rules.
		OEHS regulates and assists public water systems, including educating their customers, to provide water that meets the SDWA. The Central Office and District Offices provide assistance and advice to concerned citizens by phone calls, e-mail, U.S. Mail, public meetings, and visits to individuals' homes. An attempt is made to answer questions as quickly and effectively as possible. Staff has participated in the cross-connection and backflow prevention training for sanitarians, for operators and for Backflow Preventor Testers. Prepares and sends generic information packages on cross-connection and backflow prevention that include a prepared ordinance for municipalities and a policy for PSDs and other water systems; Participates in seminars regarding problem areas with cross-connection and backflow prevention applications and ordinances and policies.
		Implement and enforce the Cross-Connection Control Program. This is an area that is questioned and discussed when Sanitary Surveys are conducted. A contract with a vendor has been implemented to provide one-week training and one day refresher training classes for cross-connection control and back flow prevention for operators employed by small community water systems serving 3,300 or fewer.
		Define SDWIS long-term strategies. Currently have a contract with a SDWIS/computer consultant to assist in the use and maintenance of the programs. This consultant has developed and installed companion programs that are used to accomplish many of the tasks associated with regulating drinking water. Currently we are planning on converting to SDWIS/State Web Release 1 in 2007.
		Increase the use of the State Node (SDWIS/State Web Release 1) for sharing information with Federal, State, and local partners. The plan is to use the State Node to provide Drinking Water Watch to interested parties and use the Node to transfer required data to SDWIS/ODS.
		OEHS will continue to provide certification and continuing education training courses in accordance with the Drinking Water System Operator Regulations.

		OEHS will prepare and communicate regulatory changes, best practices, and useful information to water treatment operators. OEHS informs the water treatment operators through; District Office site visits to water systems (Sanitary Survey, Inspections, Assistance Visits, etc.); Capacity Development Site Assessments and Assistance Program; telephone contact; various mailings; web site; training sessions; conferences, etc. Through system training which is conducted periodically throughout the state at RWA conferences and technical expositions (EXPO) as well as through Class Operator Training classes. OEHS provides a newsletter to water operators providing information pertaining to their profession. The OEHS web page contains information for water operators including: scheduled classes, link to rules, listing of classes approved for continued education, and other information. OEHS prepares and distributes a calendar to all water systems that list operator training courses throughout the year.
		OEHS will cooperate with AWWA in recognizing and promoting the achievements of water operators. The West Virginia section of AWWA presents an award to two water system operators each year at their annual conference. OEHS staff is instrumental in nominating, selecting, and presenting the awards to the water operators.
		Maintain the Safe Water Operator Certification System (SWOCS) database, integrated with certain parts of SDWIS to provide specific information on certified personnel involved in providing safe drinking water. Phase One (which is now complete and in operation) was the development of a database module called “Safe Water Operator Certification Systems” (SWOCS) that is compatible with SDWIS/State. Phase Two (which is now complete and in operation) was the development of a module for reports and letters. Planning stage for Phase 3 will allow for limited “Read only” access via the internet to review status of water operators by our district staff.
		Continue to validate operator exams to comply with US EPA requirements. WV used the Develop-A-Curriculum (DACUM) process to help in the validation procedure to comply with US EPA guidance for validation of exams. The theory behind DACUM is to bring together several subject matter experts into a brainstorming session to discuss their specific job duties and the tasks associated with accomplishing those duties. The task identification step for the DACUM process is complete for Class 1 through Class IV water operators. Reviews of the Water Operator exams and curriculum takes place as information on the DACUM results come in and through water exam committee meetings. The water exam committee meetings include OEHS staff along with higher classification water operators, Environmental Training Center staff, and Rural Water Association staff.
		Revise the existing protection zones developed in 1999-2000. We are in the developmental phase of providing a contract for this project.

		OEHS will provide training for surface water system operators to optimize their treatment plant performance. OEHS staff has taken an active role in the Area Wide Optimization Program (AWOP). Several of the staff has attended training in utilizing the various tools associated with AWOP and they have passed that information on to other staff members. This has been utilized by OEHS staff to assist water operators in better understanding of processes utilized in water treatment and helping them to optimize the treatment plant. The information generated by the AWOP program has been used in developing the Capacity Development baseline, in addition to other criteria.
3.0.3	**15% set-aside funded activities**	Conduct Capacity Development Assessments (CDA) of water systems to determine their financial, managerial, and technical capacities. OEHS conducted 24 assessments of water systems throughout the state between July 1, 2005 and June 30, 2006.
		Issue a water system assessment report. OEHS issued 24 reports to water systems between July 1, 2005 and June 30, 2006. Assessment reports provide the water system a detailed TMF evaluation and provide recommendations to improve system viability.
		Monitor water system progress. OEHS Capacity Development staff has contacted water systems to determine their progress in addressing comments from the Capacity Development assessments/reports. In general, water systems that received a capacity development assessment showed more improvement than water systems that did not receive a capacity development assessment. This was determined from comparing scoring from previous baseline studies. Detailed information on system improvements was provided in the Governor's Report and the 2005 Annual Report.
		Maintain a baseline assessment of all community and non-transient public water systems.
		Analyze baseline data and determine overall trends of community and non-transient public water systems.
		Comply with federal and state capacity development reporting requirements. OEHS complied with the requirements through providing a report to the Governor's office and completing the baseline survey prior to the required dates. OEHS also provided an annual report to the EPA which indicated its implementation of the Capacity Development Strategy.
		Provide program information to the water system and agencies. The OEHS web page provides a variety of program information to anyone that can access the internet. Many of the mailings that are distributed by OEHS go to water systems, operators, stakeholder organizations, and other agencies.
		Continue to develop and implement the source water protection program. For further information, refer to Section 3.3.0.
		Determine if water sources are groundwater under the direct influence (GWUDI) of surface water. For further information, refer to Section 2.2.6.

		Sponsor a symposium or workshop in West Virginia to exchange information and ideas related to source water protection. For further information, refer to Section 3.3.0.
		Continue collaborating with the Department of Environmental Protection's (DEP) Underground Injection Control (UIC) Program. Continuation of funding for the DEP UIC Class V program to locate UIC Class V wells in source water protection and sensitive hydrological areas within West Virginia. This work also includes an inventory of underground and above ground storage tanks in the SWAP/WHP area.
		Update and add additional Geographical Information System (GIS) capabilities. Continue to support the GIS capabilities by renewing software licenses from ESRI and acquiring software updates.

3.1 Capacity Development

Background Notes:

The State had until September 30, 1999 to obtain legal authority or other means to ensure that all new CWSs and new NTNCWSs that commence operation after October 1, 1999, demonstrate technical, managerial, and financial (TMF) capacity with respect to the NPDWRs. Twenty percent of a State's allotment would have been withheld beginning October 1, 1999 for FY'00 funds. In the fiscal years following a state's initial documentation of a fully functional program, a state must document that it is requiring a demonstration of technical, managerial, and financial capacity by every new CWS and every new NTNCWS to avoid withholding of 20% of its DWSRF allotment. 1452(a)(1)(G)(i) and 1420 (a), and page 15 of the February 28, 1997 DWSRF Guidelines.

The State had until August 6, 2000 to develop and begin implementing a strategy to assist existing PWSs in acquiring and maintaining technical, managerial, and financial capacity, otherwise 10% of the FY '01 DWSRF funds allocated to the State would have been withheld. In the fiscal years following a state's initial documentation of a fully functional program, a state must document that it is implementing its strategy to avoid withholding of 20% of its FY'03 DWSRF allotment and in each subsequent year. 1452(a)(1)(G)(i) and 1420 (c), and page 16 of the February 28, 1997 DWSRF Guidelines.

3.1.0	**Capacity Development Authority (New Systems)** SDWA Section 1420 The state's program will be evaluated annually as of October 1. The withholding occurs at the time of the DWSRF award for those FY funds. **Appendix D is a placeholder for new EPA Guidance expected Summer 2005**.

3.1.0.1	Annual Review and Reporting on New System Demonstration of TMF: A state must document that it is requiring a demonstration of technical, managerial, and financial capacity by every new CWS and every new NTNCWS. Documentation could consist of summary statistics regarding the number of new CWSs and NTNCWSs and the results of their required capacity demonstrations. Documentation should also address methods used to evaluate and verify program implementation. Each semi-annual progress report should include: • Number and list of approved new CWSs and NTNCWSs • Compliance status of new CWSs and NTNCWSs that commenced operation after October 1, 1999 See PWSS Guidance, Appendix D for a sample reporting format.	Annual Capacity Development Program report was provided to the EPA in November 2005. This report documented the WV Capacity Development Program (CDP) was implementing our new systems TMF Demonstration. The report included: Number and list of improved new CWSs and NTNCWs. Compliance status of new CWSs and NTNCWSs permitted over the past 3 years (2001 – 2005). US EPA Region III reporting criteria, June 21, 2005. Next report due November 2006. **EPA Comment:** November 2006 report was received on time.
3.1.1	**Capacity Development Strategy <u>(Existing Systems)</u>** 1452(a)(1)(G)(i) and 1420 (c), and page 16 of the February 28, 1997 DWSRF Guidelines. A state must document that it is implementing its strategy to avoid withholding of 20% of its DWSRF allotment in FY'03 and subsequent years. **Appendix D is a placeholder for new EPA Guidance expected Summer 2005**.	

3.1.1.1	Annual Review and Reporting for <u>existing system</u> implementation: **Each year, as a stand-alone submittal; as part of the semi-annual self assessment; or as part of the state's capitalization grant application**, the state must provide documentation showing the ongoing implementation of their capacity development strategy. Such documentation may consist of a concise narrative description of the major activities being conducted and planned for under the state's capacity development strategy.	Annual Capacity development Program Implementation Report submitted prior to November 30, 2005. **EPA Comment:** WVDHHR successfully met this grant commitment.
3.1.2	**Other Annual Review and Ongoing Reporting Requirements:**	
3.1.2.1	Submit, and periodically update, a list of CWSs and NTNCWSs that have a history of significant noncompliance (SNC) and, to the extent practicable, the reasons for their noncompliance. Failure to submit the list could result in the withholding of 20% of the state's DWSRF. (This activity repeats every three years) SDWA 1420(b)	This list was completed and submitted to EPA via e-mail and hard copy on July 12, 2006. Next list is due on August 6, 2009.
3.1.2.2	The State must submit a report to the Governor on the efficacy of the strategy and progress made toward improving the technical, managerial, and financial capacity of PWSs in the State. The report shall also be made available to the public. (This activity repeats every three years). See EPA Guidance provided on suggested content of this report	Next report is due September 30, 2008.
3.2	**Operator Certification Programs**	
3.2.1	To avoid a 20% SRF withhold, States must continue to implement Programs that meet the baseline requirements of the Guidelines and provide Annual Program Reports as per EPA Guidance memo dated 10/15/2001.	Annual Report submitted to EPA in June 2006. **EPA Comment:** State program approved September 20, 2006.

3.3	**Source Water Assessment and Protection** **<u>Background Notes:</u>** **Source water assessments are required of primacy States, if the State chooses to adopt alternative monitoring requirements under 1428(b). DWSRF funds can be set aside to administer or provide technical assistance through source water protection programs.**

3.3.0	Implement State Source Water Assessment Program (SWAP) Plan, and **report** progress and relevant activities underway. Include copies of contract agreements, MOUs, etc. with other agencies and contractors as per DWSRF Grant Condition. Discuss any significant barriers to implementation with EPA as soon as possible. **The GPRA Goals are**: a) # and % of population and community water systems (or source water areas) that will achieve minimized risk to public health by substantial implementation, as determined by the state, of source water protection actions in a source water strategy. b) # and % of community water systems (or source water areas) that have a protection strategy in place. c) # and % of community water systems (or source water areas) that have implemented some aspect of a protection strategy. SDWA 1453(a)(3) & GPRA	See Appendix E – Source Water Protection Reporting Form, FY 2006 1. WVDHHR continues to complete SWAP/WHPP studies for new PWS systems within the state and continues to participate and build SWAP protection efforts by prioritizing efforts, program resources, education and outreach efforts in developing and implementing protection measures. 2. Applications for the Wellhead protection grants program to protect existing groundwater sources in community public drinking water have been sent out. Application deadline is September 1, 2006. 3. WVDHHR continues to financially support the WVDEP UIC Class V program. Contract has been signed and work is proceeding. 4. WVDHHR continues to partner with the WVDEP Water Education Training Program to train public school teachers and students about drinking water. Vendors for constructing the groundwater models to be loaned out as part of this program have been selected. 5. Ground Water Methane Study – USGS contract has been completed. A fact sheet on this issue has been developed. A copy of this new fact sheet can be obtained at http://pubs.usgs.gov/fs/2006/3011/. It is our hope that this information presented in this new fact sheet will be used to minimize the risk to all who come into contact with these areas where methane gas could become explosive. 6. 2005 Water Awareness Symposium – Participated with Source Water Potomac Partnership group to co-sponsor the Emerging Contaminant conference held in West Virginia in 2005. One is scheduled in October 2006 at the Stonewall Jackson Resort. 7. Yield and Drawdown – USGS proposal is currently under review to develop guidance. Progress has been slowed by possible revisions to the current WV water well regulations and design standards. 8. Revision to the SWAP/WHP database to track implemented and substantial implementation status for community systems. 9. The West Virginia Bureau for Public Health (WVBPH) website continues to provide information on the SWAP/WHP programs and guide municipalities, water suppliers, or other groups through developing a local SWAP program. Future projects include the development of a secure website that will provide the wellhead and source water areas, location of public supply wells, and potential contaminants sources for use by other utilities, state, emergency management, and federal agencies. 10. Continuation of the SWAP/WHP Memorandum of Understanding (MOU) that has been signed by a number of state ground water regulatory agencies, establishes a coordinated effort by all agencies to protect ground water in delineated SWAP/WHP areas. The MOU enhances the SWAP/WHP programs ability to protect ground water utilized by public water systems.

4. Recommended Activities (These are activities that do not affect PWSS Primacy or the receipt of Drinking Water State Revolving Loan Funds. However many could be funded under either program.)		
Goal 2: Safe and Clear Water--Ensure drinking water is safe. Restore and maintain oceans, watersheds and their aquatic ecosystems to protect human health, support economic and recreational activities, and provide healthy habitat for fish, plants and wildlife.		
Objective 1: Protect human health by reducing exposure to contaminants in drinking water (including protecting source water), in fish and shellfish, and in recreational waters.		
Subobjective 1: Water safe to drink		
4.0	Report system street address information and the latest sanitary survey information to SDWIS, including sanitary surveys at Federal facilities. Please also report owner type codes, so that Federal facilities can be identified, and service area category information codes, so that schools, mobile home parks, etc., can be identified. Please submit complete and accurate source information. (Refer to Federal Reporting Data System (FRDS)/SDWIS documentation for the details on this reporting.) Please provide complete treatment process and treatment objective codes so that source waters requiring treatment beyond conventional treatment to address source water quality problems can be identified in 305(b) water quality assessments, and the Index of Watershed Indicators. See SDWIS reporting Guidance	On-going as data is entered into SDWIS/State. **EPA Comment:** WVDHHR successfully met this grant commitment.
4.1	Enter informal enforcement actions to SDWIS to present a more complete picture of violation follow-up.	On-going. **EPA Comment:** WVDHHR successfully met this grant commitment.

4.2	Enter or correct latitude/longitude information to SDWIS for any remaining systems. Enter or correct the information on surface water systems first. Priorities for entering data for the remaining systems are groundwater CWSs next, then groundwater NTNCWSs, followed by TNCWSs. Coordinate, as appropriate, with the EPA data management staff to ensure that all needed data storage capabilities for source water protection efforts are accounted for in the modernized EPA STOrage and RETrieval system (STORET), EPA's data management program for ambient water quality. Also coordinate with State Clean Water Act and EPA staff to strengthen State georeferencing capabilities to better track monitoring information for mapping and GIS applications. GIS tools, including the Reach File 3 system that assigns unique location identifiers to the waters of the U.S., will be valuable in source water assessments.	LAT/LONG Data input into SDWIS is approximately 99% complete as of June 30, 2006. Anticipate 100% completion by June 30, 2007 (should include all current Active sources, exception would be new sources). West Virginia has shared our source water polygon data with the EPA for use by all federal agencies as the single source of data.
4.3	Develop and maintain a cross connection control program. §142	The WVBPH continues to aggressively promote a Cross-Connection and Backflow Prevention (CCBP) program. We provide a generic information package that contains all the information necessary to initiate and to maintain a CCBP program supported by the EPA 816-R-03-002 Cross-Connection Control Manual and site visits when requested. We also promote CCBP in training classes for water operators and Backflow Preventer Assembly Testers.

4.4	Interact with other State programs, local governments, and other stakeholder groups that affect or are affected by the drinking water program (e.g., wellhead protection programs, watershed protection programs).	Continued partnership with the Potomac Drinking Water Source Protection Partnership. This partnership is composed of water utilities and the various governmental agencies responsible for drinking water protection in the Potomac River Basin. In May 2006, a SWAP/WHP stakeholder meeting was held to review the status of the SWAP/WHP programs. Representatives from various state, federal, local agencies/groups attended this meeting to provide insight concerning the programs. Continuation of the SWAP/WHP Memorandum of Understanding (MOU) that has been signed by a number of state ground water regulatory agencies, establishes a coordinated effort by all agencies to protect ground water in delineated SWAP/WHP areas. The MOU enhances the SWAP/WHP programs ability to protect ground water utilized by public water systems. Continuing to support the WVDEP Watershed Management Framework program by attending meetings and supplying requested data within the selected prioritized watershed areas within the state.
4.4.0	Plan for source water protection and source water assessment programs simultaneously. For example, use current information on the hydrology and hydrogeology of different regions of the State to determine the degree of detail appropriate for the source water assessments. These assessments are necessary to support the source water protection programs being considered. Protection programs will likely be necessary in order to provide local flexibility on monitoring relief, ground water disinfection, regulation of Class V underground injection control wells, and filtration.	On-going. Wellhead Protection Programs helps guide local drinking water protection efforts and awareness by helping to prioritize protection efforts and program resources. Assist in educational and outreach efforts in developing and implementing protection measures. Improve cooperation and coordination between state agencies and federal programs. WVDHHR continues to help fund the WVDEP UIC Class V program.

4.4.1	Participate in State implementation of the 305(b) guidelines for drinking water to elevate awareness of drinking water as a designated use within the 305(b) program, increase the percentage of waters assessed for drinking water use support, and enhance the accuracy and value of the assessments. Facilitate a working relationship between the State drinking water and clean water staff to provide the most accurate and representative assessment of source waters, based on available data which the State believes best reflects the quality of the resource. Adopt the Watershed approach. Work with State water quality standard staff to ensure that use designations under the Clean Water Act reflect the location of surface source water areas for drinking water intakes, and wellhead protection areas which may be influenced by surface water (i.e., induced infiltration of surface water into drinking water wells). Be sure upstream dischargers are aware of downstream drinking water intakes. Also, work cooperatively with State ambient monitoring staff, including the 305(b) staff, to ensure that duplication of monitoring efforts in source water assessment projects are not occurring, that existing data are recognized and used, and that any new data that are collected are appropriate. EPA Region III will assist in the use of STORET date as needed.	Staff of the BPH has developed a working relationship between the State's SDWA program, Environmental Quality Board (Effective July 1, 2005, the rulemaking authority regarding water quality standards was transferred from the Environmental Quality Board to the West Virginia Department of Environmental Protection) and the Clean Water Act (Watershed Management Framework) program to provide the most accurate and representative assessment of source waters, based on available data which the State believes reflects the quality of the resource. The BPH website continues to provide information on the SWAP/WHP programs and guide municipalities, water suppliers, and other groups through developing a local SWAP program. Future projects include the development of a secure website that will provide the wellhead and source water areas, location of public supply wells, and potential contaminant sources for use by other utilities, state, emergency management, and federal agencies. Participates with the USGS and WVDEP on the ambient groundwater mentoring program.
4.5	Coordinate with national, State, and local agencies to encourage identification and reporting of waterborne disease outbreaks associated with drinking water.	On-going.
4.6	Encourage systems to optimize their treatment plant performance beyond current requirements. (Participation in Partnership for Safe Water and/or Area Wide Optimization Program)	State is an active participant in the US EPA Region III AWOP program. States component is updated annually. Representative participates in all regular Region III meetings and participated in 2005 annual AWOP meeting in Cincinnati, OH. State has implicated participation in the first session Region III multi-state PBT to improve water treatment operator's skills and competing levels.

4.7	Perform public education responsibilities, such as responding to press inquiries, educating the general public, and conducting outreach.	On-going. WVDHHR partners with the WVDEP Water Training Program to train public school teachers and students about drinking water issues. Cooperating with other state and federal agency outreach events whenever possible. Participate at various meetings and conferences across the state to present information o the Source Water Protection Program. Always respond to press inquiries. The general public can gather information from out internet website. We exhibit at various conferences to provide information to the public.
4.8	Obtain Internet access to improve communications with other agencies, and outreach to the public. Develop computer communications with field offices.	Completed. **EPA Comment:** WVDHHR successfully met this grant commitment.
4.9	Track the following compliance assistance activities: small system assistance programs, workshops, onsite assistance, guidance on State regulations and other outreach materials, hot lines or other responses to inquiries from individuals, trade shows, and conferences. **Note:** The Office of Enforcement and Compliance Assistance at Headquarters is interested in State compliance assistance efforts. Please provide whatever information is easily available, or that does not require extensive time and resources to collect. (This type of information should also be included in the State's Annual Compliance Report, due each July 1 for the previous calendar year.) **EPA Comment:** Per Annual Compliance Report for 2005 reporting period – Annual site visits: 111; Technical Assistance visits for DBP: 210, for Turbidity: 63	1. Contract with WVRWA for HELP to provide continuing operator training/workshops. 2. WVDHHR personnel provide onsite assistance to water systems from five District offices and the central office. 3. Capacity Development personnel provide onsite assistance on the managerial, financial, and technical capacity of water systems. They also teach at public service commission, public service district and municipal seminars and the WVRWA conference. 4. WVDHHR provides compliance information on website including public water system regulations. 5. Newsletter sent out to water systems to provide information on a semi-annual basis. 6. Articles are provided for publication in Public Service Commission's newsletter six times a year. 7. Staff makes presentations at WV Contractor's Expo and Rural Water Conference, as requested.

4.10	Water Conservation Guidelines: On August 6, 1998, EPA published a document entitled "Water Conservation Plan Guidelines." These voluntary guidelines will encourage conservation by water systems, particularly small systems, thereby extending the life of water treatment infrastructure and reducing costs. The guidelines do not contain any federal requirements; however, after August 6, 1999 states and Indian Tribes may require water systems to submit a water conservation plan consistent with EPA's guidelines as a condition of receiving a loan from a State Drinking Water Loan Fund.	Capacity development assessments encourage systems to control water loss through leak and/or inadequate metering. Systems looking to receive funding through state agencies via the State Infrastructure and Jobs Development Council are typically required to address high unaccountable water losses prior to their projects receiving funding for water treatment plant expansions or extensions.
4.11	Drought Contingency and Water Supply Assistance: Continue to monitor water systems affected by drought conditions to ensure an adequate supply of water. Assist water suppliers with obtaining alternate sources, handling any contamination associated with the drought, development of contingency plans and assisting with outreach efforts on water conservation.	State assists systems impacted by drought conditions as they occur and provides assistance to emergency services offices, as needed.

5.	**Additional State Activities funded with PWSS Grant monies: Include here any additional projects funded under the PWSS grant. You may also want to use this area to track equipment purchases, staff hiring, etc. or do so on a separate page.**

6. Water Protection (Security) Coordination Grants
Separate Guidance is issued regarding these grants. This section of the checklist can be used to list the activities funded so that the Checklist can be used for reporting purposes.

Goal 2: Safe and Clear Water--Ensure drinking water is safe. Restore and maintain oceans, watersheds and their aquatic ecosystems to protect human health, support economic and recreational activities, and provide healthy habitat for fish, plants and wildlife.

Objective 1: Protect human health by reducing exposure to contaminants in drinking water (including protecting source water), in fish and shellfish, and in recreational waters.

Subobjective 1: Water safe to drink
Outcomes: improved protection of critical infrastructure; increase state preparedness, response, and recovery capabilities; increased state coordination, communication and information sharing capabilities; changes in management and operation of water systems based on training; increased awareness of water utilities, general public, local police and emergency responders, and others of the areas of concern form public water system perspective.

Tasks	Activities/Outputs
S&T Emergency Preparedness	Purchased and distributed an agency produced "Water System Security: Threat and Emergency Response Guide Manual" to Community water systems.
	Delivered presentation on agency water system security initiatives to attendees at the WV Rural Water Association's (WVRWA) annual conference
	Presented security information to attendees of the WVRWA's annual conference at an agency booth in the exhibition hall.
	Completed back-up power generation assessment of 60% of state's public water systems.
	Ordered additional tablet PCs for district utilization.
STAG – Emergency Communications	Distributed handheld PDAs for all district office personnel for rapid access to emergency contact information.
	Updated emergency water system contact information utilizing a summer intern.

	Provided cell phones and pagers to agency's emergency response employees.
	Preparing to purchase and distribute "Do Not Tamper" signs to water systems for posting at tanks, treatment plants, reservoirs, and pump stations.
	Inputting contact information into the "WARN" rapid emergency communication systems for all public water systems.
	Preparing water systems for possible avian flu pandemic outbreak.

7. Operator Certification Expense Reimbursement Grants (ERG)

Separate Guidance has been issued for these grants. Use this space on the Checklist to capture the funded activities and use this tool for reporting purposes. NOTE: Environmental Results provisions do not apply to these grants. These grants were awarded prior to EPA Order.

Goal 2: Safe and Clear Water--Ensure drinking water is safe. Restore and maintain oceans, watersheds and their aquatic ecosystems to protect human health, support economic and recreational activities, and provide healthy habitat for fish, plants and wildlife.

Objective 1: Protect human health by reducing exposure to contaminants in drinking water (including protecting source water), in fish and shellfish, and in recreational waters.

Subobjective 1: Water safe to drink

Tasks	**Activities**
ERG – Online Training	A contract has been resigned (4/06) with 360 Water, Inc. to provide online training for small system water operators to receive approved CEH hours. As of June 30, 2006, 78 individuals have completed a variety of classes in obtaining CEH credit.
ERG In-house Development	Contract is being prepared for an outside vendor to develop technology-based interactive distance education courses, on CD-ROMs and online for CEHs. The purpose is to develop training classes for class one (1) or class two (2) drinking water plant operator training for public water supply systems serving populations less than 3,300.
ERG – Backflow Prevention Assembly Test(s)	Contract signed (11/05) with the Environmental Training Center to offer training sessions. Training sessions provide a one-week training class for cross-connection control and backflow for operators employed by small community water systems and a one-day refresher training session to provide operators who are already certified to meet CEH requirements for operators employed by small community water systems. As of June 30, 2006, 34 individuals have completed this training.